REMARKS

Claims 1-8 are pending in the instant application.

Claim 3 is amended to correct a typographical error. No new matter is added by this amendment.

The Response

1. Rejection under 35 U.S.C. §103(a)

a. The Examiner rejects Claims 1-2, 4-5 and 7-8 as being unpatentable over Helman *et al.*, U.S. Patent No. 6,400,371 in view of Shimizu *et al.*, U.S. Patent No. 5,943,680. Helman *et al.* teach a method and system for presenting color television signals. Shimizu *et al.*, teach an apparatus for composing document data.

Independent Claim 1

The Examiner has indicated that Helman *et al.* teach identifying the document as comprising a hypertext markup language document. Applicants respectfully disagree with the Examiner conclusion. The section cited by the Examiner, Helman *et al.*, '371 (Col. 2 lines 57-67), refers to the display of documents generated using HTML. Helman *et al.*, do not teach identifying a document as comprising a compiled HTML document. 'Displaying' a document that merely means 'the setting of something in open view' (Merriam-Webster's Dictionary *Merriam-Webster Inc.* 1998), while 'identifying a document as comprising a compiled HTML document' refers to the ability to distinguish a CHTML document from a document in another form. Helman *et al.*, do not teach or suggest identifying a document as comprising a compiled HTML document.

Shimizu *et al.*, fail to remedy the defects of Helman. Shimizu does not teach identifying the document as comprising a hypertext markup language document.

The Examiner has indicated that Helman *et al.*, teach that each of the plurality of display elements correspond to one or more hypertext markup language tags in a source document from which the document was compiled. Applicants respectfully disagree with the Examiner's conclusion. The section cited by the Examiner in Helman *et al.*, '371,

(Col. 4 lines 51 -67) teach the HTML tags to set colors. Helman *et al.,* do not teach a plurality of display elements to set variables other than color, such as text formatting or other stylistic elements of a document.

Shimizu *et al.,* fail to remedy the defects of Helman *et al.* Shimizu *et al.* teach an apparatus for composing document data. Shimizu does not teach a plurality of display elements that correspond to one or more hypertext markup language tags.

Examiner acknowledges that Helman *et al.* fail to teach reading a color palette specified in YUV format, and further that Shimizu *et al.* do not teach a YUV color palette (Examiner Office Communication page 5, February 24, 2006). The Examiner alleges that Shimizu *et al.* teach that such a color palette is constructed and stored in a database (Shimizu, Figure 3). Applicant maintains that a color database as indicated by Shimizu is not a YUV color palette; it is merely a generic color database. The YUV color palette differs from other color palettes, such as RGB (red blue green), which is what the camera captures and what humans view. A process known as "color space conversion," is needed to convert YUV data into RGB data. From Figure 3, (Shimizu *et al.*), it is impossible to know whether the generic color database disclosed by Shimizu is a YUV color palette, RGB color palette, or other color palette. Applicants maintain that disclosing a generic color database is not teaching 'reading a color palette specified in YUV format'.

Examiner acknowledges that Helman *et al.,* fail to explicitly teach a complied hypertext markup language document. Examiner alleges that Shimizu *et al.,* teach compiling a source document (markup is tagged, structured like HTML). The Examiner alleges that Shimizu provides a mechanism for incorporation RGB, and with modifications, many other color palettes into the source, compiled source and subsequent device-dependent files. Applicants respectfully disagree with the Examiners conclusion. The disclosure of Shimizu relates to documents in the field of interpreting desktop publishing documents where it is assumed that a CGM or Post Script is used to format the graphic forms and a TIFF is used to format the images (Col. 4, lines 66 through Col. 5, line 5). Thus, the documents taught by Shimizu *et al.* utilize different process to format graphic forms and images, while the documents taught in the instant invention comprise

compiled HTML documents. CHTML or other markup languages are defined as a "language designed to describe or transform in space or time data, text, or objects into structured data, text, or objects, for example: SGML, HTML, VRML" (*American National Standard Dictionary of Information Technology)*. Shimizu provides no disclosure of 'modifications' to other color palettes into the source, compiled source and subsequent device-dependent files. Shimizu does not teach or suggest any method of interpreting documents comprising compiled hypertext markup language documents. (CHTML).

Neither cited reference, either separately or in combination teach each and every element of Claim 1 of the instant invention, namely, identifying a document as comprising a compiled HTML document, or a reading a plurality of display elements that correspond to one or more hypertext markup language tags, or reading a color palette from a compiled HTML document, the color palette specific in a YUV format. Furthermore, the cited art disclose problems related to the presentation of color television signals (Helman) and document processing for creating and editing desktop publishing documents (Shimizu). Neither cited art identifies the problem of processing a Display Object specified by an object specifying language that relies on relative positioning for use in a target device that has limited processing recourses unsuited for storage and execution of the CHTML rendering program.

Therefore, the 103(a) rejection of Claims 1, and the claims that depend from it Claim 1 should be withdrawn.

Independent Claim 8

The Examiner rejects Claim 8 along the same rational as it relates to the method of interpreting a document as in Claim 1. Claim 8 teaches an apparatus for interpreting a document for a television. The Applicant respectfully traverses this rejection with the same argument as presented above namely, identifying a document as comprising a compiled HTML document or a reading plurality of display elements that correspond to one or more hypertext markup language tags or reading a color palette from a compiled HTML document, the color palette specific in a YUV format. Furthermore, the cited art refer problems related to the presentation of color television signals (Helman) and

document processing for creating and editing desktop publishing documents (Shimizu). Neither cited art teaches or suggests the problem of processing a Display Object specified by an object specifying language that relies on relative positioning for use in a target device that has limited processing recourses unsuited for storage and execution of the CHTML rendering program.

Independent Claim 7

The Examiner rejects Claim 7 along the same rational as it relates to the method of interpreting a document as in Claim 1. As described above, the combination of Helman and Shimizu fail to teach all elements of Claim 7, particularly, 'reading a plurality of display elements from the document, each of the plurality of display elements corresponding to one or more hypertext markup language (HTML) tags in a source document from which the CHTML document was compiled'. Therefore, the 103(a) rejection of independent Claim 7 should be withdrawn.

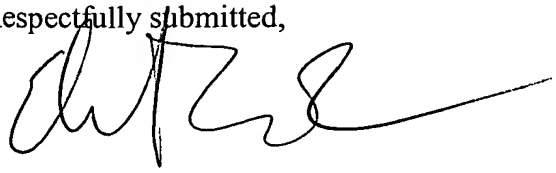
Dependent Claims 3 and 6

b. Claims 3 and 6 stand rejected under 35 USC 103(a) as being unpatentable over Helman *et al.* in view of Shimizu *et al.* and in further view of Hill *et al.*. Claims 3 and 6 depend from Claim 1. The deficiencies of Helman and Shimizu have been described above with regard to independent Claim 1. The teachings of Hill *et al.* fail to remedy these defects. Hill teaches a method and system for dynamically adapting the layout of a document to an output device. Hill does not teach identifying the document as comprising a compiled hypertext markup language (CHTML) document or reading a color palette from the document, the color palette specified in a YUV format. Therefore, the 103(a) rejection of dependent Claims 3, and 6 should be withdrawn.

CONCLUSION

In view of the foregoing amendment and remarks, the Applicants believe that the application is in good and proper condition for allowance, and such allowance is respectfully requested. If, in the opinion of the Examiner, a telephone conference would expedite the prosecution of the subject application, the Examiner is invited to call the undersigned at (650) 798-3547.

Respectfully submitted,



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